HOWARD LEADER

ATTORNEY AT LAW
534 WEST 112TH STREET
P.O. BOX 850294
NEW YORK, NEW YORK 10025
TELEPHONE (646) 533-7696
FACSIMILE (646) 590-9676
E-MAIL HOWARD.LEADER@GMAIL.COM

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Hon. Edgardo Ramos United States District Judge United States Courthouse Southern District of New York 40 Foley Square New York, New York 10007

June 10, 2022

<u>United States v. Karl Sebastian GREENWOOD</u> 17 Cr. 630 (ER)

Dear Judge Ramos:

This matter is currently scheduled for an in-person status conference before the Court on June 16, 2022 at 11:00am. This letter is to request an adjournment on consent for ten (10) days. The government consents.

The purpose of the adjournment is to give the parties sufficient time to agree upon a proposed briefing schedule and trial date, which we hope to submitto the Court on the adjourn date. The additional time is necessary as the MDC, Brooklyn, where our client is being held, has recently been under lockdown. Accordingly, meeting with him to discuss longer term scheduling has not been possible.

We are also still in the process of receiving and reviewing the very voluminous discovery in this matter.

Under the circumstances, we have no objection to an exclusion of time under the Speedy Trial clock.

Finally, should the Court decide that the adjourned conference can take place remotely, Mr. Greenwood is prepared to waive his right to attend in-person. It is counsel's understanding that the Constitution, the Federal Rules and the CARES Act so permit.

Respectfully submitted,

/s/ HOWARD LEADER

cc: Nicholas Folly, Esq.,
Juliana Newcomb Murray, Esq.
Michael McGinnis, Esq.
Assistants United States Attorney (VIA ECF)